

Nico Banks (CA SBN:344705)  
**BANKS LAW OFFICE**  
712 H St NE, Unit #8571  
Washington, DC 20002  
Tel.: 971-678-0036  
Email: nico@bankslawoffice.com

Richard A. Nervig (CA SBN:226449)  
**RICHARD A. NERVIG, P.C.**  
501 West Broadway, Suite 800  
San Diego, CA 92101  
Phone: 760-451-2300  
Email: richard@nerviglaw.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH, et al.,  
Plaintiffs,  
v.

RYAN CARROLL, et al.,  
Defendants.

Case No. 2:24-cv-02886-WLH-SK

**STIPULATION RE: RESPONSE OF  
DEFENDANT MATTHEW  
CROUCH TO COMPLAINT**

Judge: Hon. Wesley L. Hsu  
Magistrate: Hon. Steve Kim

Complaint Filed: April 9, 2024

WHEREAS, on May 20, 2024, Plaintiffs filed a First Amended Complaint adding Matthew Crouch ("Crouch") as a new defendant in this action.

WHEREAS, Crouch has not yet been served with a summons in this action.

WHEREAS, Plaintiffs and Crouch are currently discussing a potential resolution of Plaintiffs' claims against Crouch, and anticipate that these discussions may take significant time.

WHEREAS, in order to preserve judicial resources and permit continued

1 settlement discussions, Plaintiffs and Crouch have agreed, subject to approval of the  
2 Court, that Crouch will waive service of a summons in this action subject to the  
3 terms and conditions set forth below.

4 WHEREAS, this Stipulation does not constitute a waiver by Crouch of any  
5 defense, including but not limited to the defenses of lack of personal jurisdiction,  
6 subject matter jurisdiction, improper venue, sufficiency of process or service of  
7 process.

8 THEREFORE, Plaintiffs and Crouch hereby stipulate and agree, subject to  
9 approval of the Court, as follows:

10 1. Crouch waives service of a summons in this action.

11 2. Crouch shall not be required to answer or otherwise respond to the  
12 complaint in this action until September 30, 2024.

13 3. This Stipulation does not constitute a waiver by Crouch of any defense,  
14 including but not limited to the defenses of lack of personal jurisdiction, subject  
15 matter jurisdiction, improper venue, sufficiency of process or service of process.

16 DATED: June 28, 2024

BANKS LAW OFFICE

17 By: /s/Nico Banks

18 NICO BANKS

19  
20 DATED: June 28, 2024

RICHARD A. NERVIG

Richard A. Nervig

21  
22 *Attorneys for Plaintiffs*

23 DATED: June 28, 2024

SOLOMON WARD SEIDENWURM &  
SMITH, LLP

24  
25 By: /s/ Levi Y. Silver

26 LEVI Y. SILVER

27 *Attorneys for Defendant Matthew Crouch*  
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**ATTESTATION**

I, Nico Banks, hereby attest that all other signatures listed above and on whose behalf this filing is submitted concur in this filing's content and have authorized me to file on their behalf.

/s/Nico Banks  
Nico Banks